

Congress of the United States
Washington, DC 20515

March 11, 2021

Acting Director Rob Fairweather
Office of Management and Budget
725 17th Street NW
Washington, D.C. 20503

Dear Acting Director Fairweather:

On January 19, 2021 the Office of Management and Budget (OMB) published a request for public comment on recommendations had received from the Metropolitan and Micropolitan Statistical Area Standards Review Committee for changes to OMB's metropolitan and micropolitan statistical area standards.

We are extremely concerned about the recommendation that the minimum urban population to qualify as a metropolitan statistical area (MSA) is being increased from 50,000 to 100,000. This change would arbitrarily relegate hundreds of MSAs to micropolitan status and cause Michigan to lose nearly half of their MSAs. Those regions in Michigan losing MSA status are Battle Creek, Bay City, Jackson, Midland, Monroe, and Niles-Benton Harbor. The state of Michigan's Department of Technology, Management and Budget (DTMB), through a Federal-State cooperative agreement, works with the U.S. Bureau of Labor Statistics Market Information and Strategic Initiatives to produce statistical information for all MSAs. If this recommendation is implemented this critically important data would no longer be provided for the six areas being downgraded.

While we understand metropolitan area delineations are used for statistical purposes at OMB, the practical implications of changing designations can have significant unintended consequences that negatively impact the residents of these areas. In a March 2, 2021 letter DTMB warned, "the designation of MSAs could impact funding levels from agencies such as the Metropolitan Planning Organization (MPO), Housing and Urban Development (HUD), and the U.S. Department of Transportation (DOT)." Moreover, these federal dollars spur state, local, and private investment that creates jobs and bolsters the economy.

As we continue to emerge from the pandemic we must focus our energy on policies that improve the wellbeing and economic opportunities for all Americans and request you do not implement the recommendation increasing the population to be considered a metropolitan statistical area.

Sincerely,



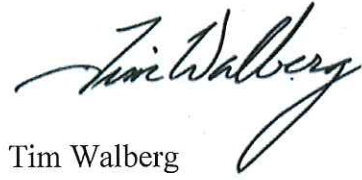
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